

FEE APPLICATION COVER SHEET

First Interim Fee Application of Quilling, Selander, Lownds, Winslett & Moser, P.C.

For the time period of May 12, 2023 through March 31, 2024

Capacity: Counsel to Kent Ries, Trustee Chapter: 7

Debtor/Case: *McClain Feed Yard, Inc. et al*; Case No. 23-20084-rlj7

Retainer Received: \$0.00

Amount Previously Paid: \$0.00

Amount Requested:

Reductions (unless contested):

Fees: \$249,023.97

Vol. Fee Reductions: \$39,911.03

Expenses: \$976.03

Expense Reductions:

Other:

Total Reductions: \$39,911.03

Total: \$250,000.00

Expenses:

Copies per page: \$0.20

WestLaw/Lexis: \$0.00

Faxes per page: No Charge

Other (specify): Postage, Pacer, research, court fees, etc. : \$970.83

Hourly Rates: Attorney/Accountant

Paralegal/Clerical

Highest Rates: \$525.00

Hours Billed: 570.6

Average: \$436.42 (with voluntary reduction)

/s/ Hudson M. Jobe
Signature

April 19, 2024
Date

Hudson M. Jobe
Texas Bar No. 24041189
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SPECIAL COUNSEL TO THE TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	
	§	
MCCLAIN FEED YARD, INC., et al.,¹	§	CASE NO. 23-20084-RLJ-7
	§	
	§	
Debtors.	§	Jointly Administered

**FIRST INTERIM APPLICATION FOR ALLOWANCE OF FEES AND
EXPENSES OF QUILLING, SELANDER, LOWNDS, WINSLETT & MOSER, P.C.**

NOTICE

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 205 SOUTHEAST 5TH AVENUE, ROOM 133, AMARILLO, TEXAS, 79101-1559 BEFORE CLOSE OF BUSINESS ON MAY 10, 2024, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY. IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

¹ The Debtors in these Chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ)

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

Quilling, Selander, Lownds, Winslett & Moser, P.C. (“QSLWM”), special counsel to Kent Ries, Trustee (“Trustee”) of the referenced Chapter 7 bankruptcy cases the “Bankruptcy Cases”), files its First Interim Application for Allowance of Fees and Expenses (the “Application”), and would respectfully show the Court as follows:

I. SUMMARY

1. As the Court is well-aware, the Debtors’ Chapter 7 cases are complicated and involve hundreds of millions of dollars of transactions and other transfers in connection with an alleged Ponzi-scheme that include over 100 claimants claiming in excess of \$175M of losses in connection with, in many cases, apparent passive investments in the Debtors’ intertwined cattle operations. The Trustee’s investigation has been significant and is ongoing, and is expected to result in considerable litigation claims in an effort to provide a meaningful return to the ultimately allowed good-faith creditor and investor claims.

2. The Trustee, with the assistance of special counsel, has successfully pursued and settled a Chapter 5 avoidance claim for \$3,000,000.00 related to the recovery of proceeds of life insurance where the premiums were allegedly paid by fraudulent transfers from the Debtors’ funds.

3. QSLWM has assisted the Trustee in these efforts without payment for fees or reimbursement for expenses for almost a year. By this Application, QSLWM seeks approval and payment of its fees and expenses through March 31, 2024 from the \$3,000,000.00 of proceeds realized from the avoidance claim.

4. QSLWM’s fees and expenses total \$289,911.03. However, as consideration for the stage of the case and to minimize objections thereto, QSLWM only seeks approval and payment of \$250,000.00 provided that this amount is approved and paid in full without objection. In the event of any objection, QSLWM reserves the right to request the additional amounts.

II. EMPLOYMENT AND PRIOR COMPENSATION

5. The Debtors filed for relief under Chapter 7 of the United States Bankruptcy Code on April 28, 2023 (the “Petition Date”). Kent Ries was subsequently appointed and qualified to serve as the Trustee over the bankruptcy estate.

6. On June 30, 2023, the Trustee filed an application for authority to employ QSLWM as special counsel in this case (Dkt. No. 69). On July 7, 2023, this Court entered an order approving the Trustee’s employment of QSLWM (Dkt. No. 75). An expanded scope of QSLWM’s engagement was thereafter confirmed pursuant to motion filed on September 11, 2023 (Dkt. No. 120) and approved by Court order on November 1, 2023 (Dkt. No. 144).

7. QSLWM has not requested or received any fees or expenses for services provided to the Trustee in this case.

8. This Application covers the period of time from May 12, 2023 through March 31, 2024. No agreement exists between QSLWM and any other person or entity for the sharing of compensation to be received for services rendered in connection with this case, except that such compensation will be shared among the employees of QSLWM.

III. CASE BACKGROUND

9. Each of the Debtors operated a cattle feedlot and/or growyard. McClain Feed Yard, Inc. (“MFY”) owned real property outside of Hereford, Texas; McClain Farms, Inc. (“MF”) leased real property in Kentucky; and 7M Cattle Feeders, Inc. (“7M”) owned real property outside of Friona, Texas (collectively, the “Debtors”).

10. The Debtors’ business operations have significant overlap, including one major secured creditor (Rabo AgriFinance LLC) whose alleged claim exceeds \$53,000,000.00 pursuant to its recent motion for relief from the automatic stay. Rabo claims cross-collateralization and a blanket lien on substantially all of the Debtors’ assets. Further, many of the same vendors,

customers and investors did business with all three Debtors. Finally, the owner of all three Debtor entities was Brian McClain.

11. All of the Debtors' business operations were shut down prior to their bankruptcy filings. All cattle and other livestock were apparently sold by the Debtors or removed by their alleged owner's pre-petition.

12. As discussed in prior pleadings, based upon the Trustee's investigation thus far, the Debtors' prebankruptcy operations appear to have constituted a massive fraud involving two cattle operations in Texas (Hereford and Friona) and one in Benton, Kentucky. The asserted unpaid claims exceed \$175M so far, and the Debtors' records show several hundred million dollars flowing through the Debtors in the 3 years before bankruptcy. These cases will involve over 100 parties and their attorneys based upon the service list thus far.

13. The Debtors' owner, Mr. McClain, committed suicide on April 18, 2023, less than 2 weeks after the appointment of a Chief Restructuring Officer that was investigating the Debtors' financial affairs. The Trustee's investigation thus far, including with the assistance of the pre-bankruptcy CRO, has been considerable and will be ongoing for some time due to, among other things, the Debtors' poor and unreliable records.

14. It appears that the Debtors' cattle operations included at least some actual cattle transactions whereby, in some instances, the Debtors' purchased cattle ("Cattle Purchases"), and in other instances, took possession of third-parties' cattle for the Debtors' to fatten/grow prior to sale ("Feed Yard Services"). In addition to Cattle Purchases and Feed Yard Services, it appears that Mr. McClain also raised money from many "investors" pursuant to "partnership agreements" whereby the "investors" would advance funds to one of the Debtors to "purchase" unspecified cattle from the Debtor (that were purportedly already under a contract for sale in the future at a

higher weight and price), the Debtor would continue to hold and feed the cattle at its expenses, and the investor and applicable Debtor intended to split the later profit 1/3 to the Debtor and 2/3 to the investor (the “Partnership Agreements”).

15. Over 100 claimants have asserted claims exceeding \$100 million with the United States Department of Agriculture (“USDA”) under the Dealer Trust Statute for allegedly unpaid amounts for Cattle Purchases, cattle that were dropped off for Feed Yard Services, investments under the Partnership Agreement, and possibly other transactions not yet specified by the claimants. Additionally, upon belief many of these claimants and possibly other parties ostensibly “reclaimed” millions of dollars of cattle in the chaotic period following Mr. McClain’s death.

IV. CASE STATUS

16. The Trustee has spent considerable time and resources investigating the Debtors’ pre-bankruptcy financial affairs, and the investigation is ongoing. Based upon his investigation thus far, the Trustee believes that the Debtors’ estates may have claims against investors, lenders, and other agricultural entities.

17. In addition to various other funds, the Trustee is holding \$3,000,000.00 that constitute the proceeds of certain Chapter 5 avoidance claims investigated, pursued, and ultimately settled by the Trustee related to the alleged fraudulent transfers of Debtors’ funds for the purposes of funding term life insurance for Mr. McClain.

18. As discussed in prior hearings, the Trustee’s investigation of additional claims is ongoing. The Trustee has obtained many thousands of pages of discovery from over a dozen sources, and expects to pursue and obtain even more in the future. The Trustee has, and continues to analyze, the Debtors’ pre-petition transactions and other transfers that total in excess of \$100M per month in some cases. The Trustee anticipates pursuing additional claims against various third parties in the future in an effort to provide a meaningful return to good faith investors and creditors

in this case. Virtually all of the claims in this case are contested, and therefore it is not possible to provide an interim dividend to general unsecured creditors at this time.

V. ATTORNEY'S FEES AND EXPENSES

19. From May 12, 2023 through March 31, 2024, the Trustee incurred attorney's fees in the aggregate amount of \$288,935.00 and expenses in the aggregate amount of \$976.03 with respect to QSLWM's representation.

20. Exhibit "A," which is attached hereto and incorporated herein by reference for all purposes, conveys the following information for the time period covered by this Application: (a) the number of hours worked by each attorney and staff member on a particular day; (b) the manner and type of work performed by each attorney and staff member; (c) the billing rate for each person rendering service in this matter; (d) the monetary value assigned to each task performed by a given attorney and/or staff member; and (e) the amount and description for all expenses for which QSLWM seeks reimbursement.

21. All photocopies included in this Application were billed at \$0.20 per page, and all other expenses were billed at the actual cost.

VI. SUMMARY OF SERVICES RENDERED

22. Following is a summary of services rendered with the total time and fees attributable to each general category by attorney:

a. General Case Background. The time in this category includes initial review and communication regarding the general background of the Debtors and their filings.

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Hudson M. Jobe	13.30	\$525.00	\$6,982.50

b. General Case Administration. The time in this category includes handling various matters in the Debtors' main bankruptcy cases regarding employment, motions for relief from stay, 341 meeting, identification of location of records, contested venue proceedings, related discovery, and tax issues.

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Hudson M. Jobe	79.50	\$525.00	\$41,737.50

c. USDA Claim Issues. The time in this category includes investigation, researching, and reviewing voluminous documentation and number of legal issues pertaining to the significant number and dollar amount of USDA Dealer Trust Act claims, including issues with allowance/disallowance, trust fund ramifications and tracing burdens, and implications of same upon estate property and administration.

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Brent Rodine	3.30	\$350.00	\$1,155.00
Hudson M. Jobe	62.00	525.00	32,550.00
Frank Patel	9.40	275.00	2,585.00
Braden Reid	5.60	200.00	1,120.00

c. Life Insurance Issues. The time in this category includes investigation, research, and prosecution of Chapter 5 avoidance claims related to the recovery of proceeds of life insurance where the premiums were paid by alleged fraudulent transfers from the Debtors' funds, including the settlement of a portion of those claims through a contested \$3,000,000.00 settlement.

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Hudson M. Jobe	108.70	\$525.00	\$57,067.50

d. Investigation of Possible Estate Claims Assets. The time in this category includes the considerable ongoing investigation and research generally into potential claims of the estate stemming from the Debtors' significant prepetition transactions and other transfers, which appear to constitute a massive Ponzi scheme. The time in this category includes the pursuit and processing of significant (and in some cases contested) discovery and records of the Debtors, and time associated with an associated bankruptcy case of 2B and three pending related adversary proceedings.

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Brent Rodine	20.70	\$350.00	\$7,245.00
Hudson M. Jobe	252.30	525.00	132,457.50
Gregory M. Sudbury	11.50	450.00	5,175.00
Braden Reid	4.30	200.00	860.00

VII. FIRST COLONIAL FACTORS

23. In support of this request for allowance of compensation and reimbursement of expenses, QSLWM respectfully directs this Court's attention to those factors generally considered by Bankruptcy Courts in awarding compensation to professionals for services performed in connection with the administration of a bankruptcy estate, as enumerated in 11 U.S.C. § 330 and

developed by case law. Specifically, section 330 provides, *inter alia*, that the allowance of professional compensation should be based upon the time, nature, extent and value of the services rendered as well as consideration of the cost of comparable services rendered in a non-bankruptcy context. The controlling authority in the Fifth Circuit is *In re First Colonial Corp. of America*, 544 F.2d 1291 (5th Cir. 1977). In *First Colonial*, the Court of Appeals for the Fifth Circuit identified twelve factors to guide this Court's decision. Those factors as applied to the services rendered in this case by QSLWM for the time period covered by this Application are addressed below.

(a) **The Time and Labor Required.** QSLWM respectfully refers the Court to Exhibit "A," which details the services performed by QSLWM's attorneys and paralegals in this case. The time period covered by this Application spans approximately 10.5 months within which a total of 570.6 hours of attorney and paralegal time has been expended. QSLWM believes that all of the services performed are compensable in that they represent actual and necessary services performed in representing the Trustee in this case.

(b) **The Novelty and Difficulty of the Questions.** The tasks reflected in Exhibit "A" involved factual and legal questions that were of moderate difficulty.

(c) **The Skill Requisite to Perform the Service.** QSLWM believes that practitioners unfamiliar with bankruptcy law would have been required to spend considerably more hours than QSLWM's attorneys and professional staff to perform the same tasks.

(d) **The Preclusion of Other Employment Due to Acceptance of the Case.** The time requirements of this case have been significant, and QSLWM has been precluded

from devoting as much time to other matters as it would have had it not been for its services as counsel for the Trustee in this case.

(e) **The Customary Fee.** The hourly rates sought herein are commensurate with the rates charged and approved in other bankruptcy proceedings pending in the Northern District of Texas. The hourly rates charged by the attorneys and paraprofessionals of QSLWM who worked on this case are as follows:

(i) Hudson M. Jobe (\$525.00 per hour per) licensed in 2003 and board certified in Business Bankruptcy Law by the Texas Board of Legal Specialization;

(ii) Gregory Sudbury (\$450.00 per hour) licensed in 2002 and has extensive litigation experience;

(iii) Brent Rodine (\$350.00 per hour) licensed in 2005 and has extensive receivership and experience with avoidance claims;

(iv) Frank Patel (\$275.00 per hour) licensed in 2019;

(v) Braden Reid (\$200.00) licensed in 2023;

(f) **Whether the Fee is Fixed or Contingent.** QSLWM's fee is fixed insofar as monies exist in the estate from which to pay such fees. Payment of QSLWM's fees, however, is subject to Court approval and the requirements of the Bankruptcy Code and relevant case law.

(g) **Time Limitations Imposed by the Client or Other Circumstances.** The time requirements of this case have been significant.

(h) **The Amount Involved and the Results Obtained.** The total amount of funds recovered through the efforts of QSLWM to date is \$3,000,000.00.

(i) **The Experience, Reputation and Ability of the Attorneys.** QSLWM has several attorneys who specialize in the practice of bankruptcy law. The practice of those attorneys regularly includes the representation of debtors, secured creditors, unsecured creditors, trustees and creditors' committees. The reputation of QSLWM's bankruptcy attorneys is recognized and respected in the community. Hudson M. Jobe is Board Certified by the Texas Board of Legal Specialization in Business Bankruptcy Law.

(j) **The Undesirability of the Case.** The representation of the Trustee incident to this case has not been undesirable other than the delays and risks associated with payment of legal fees by a trustee in a chapter 7 case, which has been fairly significant in this case.

(k) **The Nature and Length of the Professional Relationship with the Client.** QSLWM did not represent the Trustee in these proceedings prior to being retained as counsel.

(l) **Award in Similar Cases.** QSLWM believes that the fees requested in this case are less than or equal to those which have been awarded in similar cases pending in this District.

VIII. CONCLUSION

WHEREFORE, PREMISES CONSIDERED, QSLWM requests that this Court enter an order approving QSLWM's compensation of \$250,000.00 for fees and expenses for the period of time from May 12, 2023 to March 31, 2024 provided that no objections are made to this request, and in such event that this Application is contested, that the Court award \$288,935.00 for fees and \$976.03 for expenses for the period of time from May 12, 2023 through March 31, 2024, and granting QSLWM such other and further relief, general or special, at law or in equity, to which it may be justly entitled.

Respectfully submitted,

QUILLING, SELANDER, LOWNDS
WINSLETT & MOSER, P.C.

2001 Bryan Street, Suite 1800

Dallas, Texas 75201

(214) 871-2100 (Telephone)

(214) 871-2111 (Facsimile)

By: /s/ Hudson M. Jobe

Hudson M. Jobe

State Bar No. 24041189

SPECIAL COUNSEL FOR THE TRUSTEE

PROFESSIONAL CERTIFICATION

I hereby certify (a) that I am the professional with responsibility to verify compliance with the Guidelines for Compensation and Expense Reimbursement of Professionals as promulgated in the United States Bankruptcy Court for the Northern District of Texas (“Guidelines”); (b) I have read the Application; (c) to the best of my knowledge, information and belief, formed after reasonable inquiry, the compensation and expense reimbursement sought is in conformity with the Guidelines; and (d) the compensation and expense reimbursement requested are billed at rates, in accordance with practices, no less favorable than those customarily employed by QSLWM and generally accepted by QSLWM’s clients.

/s/ Hudson M. Jobe
Hudson M. Jobe

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served concurrently with filing by ECF upon all persons who have filed ECF appearances in this case, including the Office of the United States Trustee.

/s/ Hudson M. Jobe
Hudson M. Jobe



Tax ID: 75-2459334

Kent Ries, Chapter 7 Trustee of McClain Debtors

Invoice Date: March 31, 2024
 Invoice No. 507522
 Client No. 2322.0001
 Page: 1

Background of Debtors

ITEMIZED SERVICES BILL

			Hours	
05/12/2023	HMJ	Review bankruptcy filings and initial pleadings(.7); Prepare lengthy summary of general case issues for Trustee(.5); Conference with Trustee regarding general case issues and background(1.3).	2.50	n/c
05/24/2023	HMJ	Review general background case issues and conference with Trustee on same.	1.00	n/c
06/09/2023	HMJ	Comprehensive review and analysis of lien issues.	1.50	787.50
06/10/2023	HMJ	Extensive review and analysis of Debtors' Schedules and Statement of Financial Affairs and interplay of companies; outline and analysis of various follow up items for further investigation and inquiry.	2.80	1,470.00
06/12/2023	HMJ	Further research and analysis of various asserted lien issues and creditor overlap.	1.70	892.50
06/14/2023	HMJ	Review case issues and parties in preparation for 341 meeting, correspondence with Trustee on same.	0.80	420.00
06/23/2023	HMJ	Further review and analysis of issues presented in Rabo MLS, review several objections filed thereto for general case background and potential estate claim issues(1.0); Follow up with Trustee on same and related case issues(.5).	1.50	787.50
	HMJ	Several lengthy correspondence and conferences with creditors on general case background issues, location of prior records and pending discovery, related case issues.	2.50	1,312.50
06/26/2023	HMJ	Research major parties in case and outline general case involvement and background(.8); Research possibly [REDACTED] (.7).	1.50	787.50
08/18/2023	HMJ	Prepare for and attend lengthy conference with Trustee on case background issues.	1.00	525.00
		For Current Services Rendered	13.30	6,982.50

Client No: 2322-0001M
Invoice No: 507522

Background of Debtors

Recapitulation			
<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Hudson M. Jobe	13.30	\$525.00	\$6,982.50
Total Current Work			6,982.50
Balance Due			<u>\$6,982.50</u>

NOTE: PLEASE REFERENCE THE CLIENT MATTER NO. WITH PAYMENT



Tax ID: 75-2459334

Kent Ries, Chapter 7 Trustee of McClain Debtors

Invoice Date: March 31, 2024
 Invoice No. 507523
 Client No. 2322.0002
 Page: 1

General Case Administration

ITEMIZED SERVICES BILL

			Hours	
05/25/2023	HMJ	Review issues with Trustee on Rabo MLS and various correspondence related to same.	0.80	n/c
05/30/2023	HMJ	Research and review authority on [REDACTED] follow up with Trustee on same.	1.50	787.50
06/09/2023	HMJ	Prepare retention terms and follow up with Trustee on same.	0.50	262.50
	HMJ	Prepare Motion for Joint Administration(.8); Prepare Order on same(.3).	1.10	577.50
	HMJ	Correspondence with Trustee on various case issues.	0.30	157.50
06/12/2023	HMJ	Research and analysis of overall creditor mix and potential [REDACTED], correspondence and conferences with parties on same.	2.00	1,050.00
06/14/2023	HMJ	Attend 341 meetings and related post-meeting conferences with parties.	2.50	1,312.50
06/15/2023	HMJ	Several correspondence and conferences with trustee and CPA's on plans for handling and pursuing Debtors' records(1.5); Outline plans for [REDACTED] for trustee(.5); Revisions to engagement agreements and follow up with Trustee on same(.6).	2.60	1,365.00
06/21/2023	HMJ	Review proposed Order on Rabo MLS.	0.20	105.00
	HMJ	Prepare comments/revisions to Rabo MLS for consideration by Trustee.	0.30	157.50
06/22/2023	HMJ	Work with parties identifying existence, location and condition of documents and electronic files at various debtor locations, coordination of plans to obtain and marshal same.	3.20	1,680.00
	HMJ	Review schedules and coordinate preparation of master list of conflict parties, follow up with [REDACTED].	0.90	472.50

General Case Administration

			Hours	
06/23/2023	HMJ	Research and analysis of issues involved in [REDACTED] (3.0); Revise proposed accountant and legal engagement agreements(.8); Follow up with Trustee on same(.3).	4.10	2,152.50
	HMJ	Review/revise Application to Employ QSLWM(.8); Review/revise Declaration on same(.4); Review/revise Order on same(.3).	1.50	787.50
06/28/2023	HMJ	Review and revise LF engagement terms, follow up with parties on same.	0.60	315.00
06/29/2023	HMJ	Revisions to employment pleadings for both legal and accounting, follow up with Trustee on same and related case issues.	1.30	682.50
06/30/2023	HMJ	Finalize terms of legal and accounting retention pleadings and coordinate filing of same.	1.20	630.00
07/17/2023	HMJ	Several correspondence and conferences with parties on venue issues and Goad/Moreland plans to seek transfer of same.	1.40	735.00
07/18/2023	HMJ	Initial review and analysis of venue arguments of Moreland/Goad in MTV, outline of items for further review and investigation(1.4); Several correspondence with parties on same(.5).	1.90	997.50
07/20/2023	HMJ	Lengthy research and investigation into detailed background facts of venue motion related to location of various operations and property, principal place of business, location of witnesses, and alleged possible venues for litigation, situs of parties(3.2); Outline general response points to same for response to motion to transfer venue(1.8); Review updated claims and various locations of parties and counsel(.8).	5.80	3,045.00
07/24/2023	HMJ	Research and review of caselaw regarding party standing on MTV(1.1); Compilation and review of general venue considerations(1.0); Outline chart of parties/counsel and coordinate preparation of same for venue response(.9); Research arguments on new trustee appointment(.5); Research arguments on alleged subpoena range in MTV(.5).	4.00	2,100.00
07/25/2023	HMJ	Prepare for and attend lengthy conferences with parties on case background and venue issues/arguments(1.2); Draft Trustee Response to Motion to Transfer Venue and brief in support(3.0).	4.20	2,205.00
07/27/2023	HMJ	Review prior discovery on MTV movants(.5); Draft Requests for Production related to MTV(1.0); Correspondence and conferences with parties on same(.8).	2.30	1,207.50
07/28/2023	HMJ	Revise MTV discovery, follow up with movants on same.	1.00	525.00
	HMJ	Prepare for and attend lengthy conference with Trustee on case investigation, venue, and related case issues.	1.50	787.50
08/01/2023	HMJ	Various correspondence with parties negotiating discovery and related hearing timing issues related to Motion to Transfer Venue.	0.60	315.00
	HMJ	Correspondence with parties on MTV discovery.	0.30	157.50
	HMJ	Further drafting/revisions to Response to Motion to Transfer Venue and brief in support, follow up with Trustee regarding same.	1.80	945.00

General Case Administration

				Hours	
08/02/2023	HMJ	Emails with parties regarding venue discovery and hearing timing.	0.50	262.50	
08/04/2023	HMJ	Draft Motion to Continue Hearing on Venue(1.5); Review and compile possible exhibits in support(.8); Correspondence with Trustee regarding same(.5).	2.80	1,470.00	
	HMJ	Review/revisions to master attorney/party list for venue hearing.	1.00	525.00	
	HMJ	Revisions to briefing on venue response.	1.10	577.50	
	HMJ	Several correspondence with parties and court coordinating immediate hearing on timing of venue hearing.	0.60	315.00	
08/07/2023	HMJ	Several correspondence and conference with Trustee regarding venue response, related revisions to briefing.	1.90	997.50	
	HMJ	Correspondence with parties regarding hearing on venue motion.	0.30	157.50	
	HMJ	Prepare for and attend lengthy conference with parties negotiating various aspects of venue hearing and plans for same, related case issues.	1.20	630.00	
08/08/2023	HMJ	Various correspondence and conferences with parties negotiating venue issues, discovery, and related case issues.	2.60	1,365.00	
	HMJ	Finalize venue response briefing and exhibits, coordinate submission of same.	1.00	525.00	
	HMJ	Email to court re announcement on venue hearing timing.	0.10	52.50	
08/09/2023	HMJ	Prepare for and attend status conference on venue hearing.	0.80	420.00	
08/10/2023	HMJ	Review various venue responses filed by other parties, outline arguments for hearing.	0.50	262.50	
08/24/2023	HMJ	Review HTLF motion for relief from stay and follow up with Trustee on same.	0.40	210.00	
08/29/2023	HMJ	Correspondence with parties coordinating status conference on venue hearing and appearances.	0.50	262.50	
09/06/2023	HMJ	Correspondence with parties on pre-hearing venue conference in advance of status conference(.3); Prepare for and attend conference with parties on same(.8); Prepare draft Scheduling Order, circulate same with comments(.6).	1.70	892.50	
	HMJ	Review Goad/Moreland discovery on CRO, analysis of potential objections thereto, follow up with CRO on same and plans for response.	1.20	630.00	
09/07/2023	HMJ	Review prior employment documents (.2); Prepare Motion to Enlarge Scope of Retention, follow up with Trustee on same (1.0)	1.20	630.00	
	HMJ	Correspondence and conference with Trustee on venue issues and preparation for same prior to status conference(1.2); Correspondence with parties re venue scheduling order(.1); Attend venue status conference (.6).	1.90	997.50	
09/11/2023	HMJ	Finalize revisions to expanded employment documents, coordinate filing of same and setting for hearing.	0.80	420.00	

Client No: 2322-0002M
Invoice No: 507523

General Case Administration

			Hours	
09/28/2023	HMJ	Work with parties and court on venue hearing continuance and coordaining same with settlement discussions on life insurance issues.	0.80	420.00
09/29/2023	HMJ	Review/revise LF engagement agreement(.4); Review/revise App to Employ LF and Declaration in Support(.8); Follow up with LF regarding same and execution(.3).	1.50	787.50
10/30/2023	HMJ	Prepare CONO and Order on expanded scope of employment, coordinate submission of same.	1.00	525.00
11/02/2023	HMJ	Review potential tax claims and issues, follow up with accountants on same.	1.00	525.00
01/29/2024	HMJ	Review correspondence and various issues and records related to year end tax issues(1.0); Correspondence and conferences with accountants and counsel on same(.5).	1.50	787.50
01/30/2024	HMJ	Correspondence and conferences with accountants and counsel on tax issues.	0.50	262.50
02/14/2024	HMJ	Negotiations with Rabo and MAP regarding protective order language and revisions thereto.	0.70	367.50
02/19/2024	HMJ	Further review and negotiation of MAP protective order and revisions thereto.	0.40	210.00
02/23/2024	HMJ	Follow up with Rabo regarding tax returns and other due diligence materials.	0.30	157.50
02/27/2024	HMJ	Work with parties on additional tax return documents and related tax information.	1.00	525.00
03/19/2024	HMJ	Correspondence with Trustee on phone backup issues.	0.10	52.50
		For Current Services Rendered	79.50	41,737.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Hudson M. Jobe	79.50	\$525.00	\$41,737.50

Total Current Work 41,737.50

Balance Due \$41,737.50

NOTE: PLEASE REFERENCE THE CLIENT MATTER NO. WITH PAYMENT



Tax ID: 75-2459334

Kent Ries, Chapter 7 Trustee of McClain Debtors

Invoice Date: March 31, 2024
 Invoice No. 507524
 Client No. 2322.0003
 Page: 1

USDA Claim Issues

ITEMIZED SERVICES BILL

			Hours	
08/21/2023	HMJ	Lengthy review of documentation related to USDA claims, cattle sales, and investor claims(1.4); General research and review of statutes related to dealer trust claims and various claims/defenses to same, and potential implications upon [REDACTED](2.6).	4.00	2,100.00
08/23/2023	HMJ	Further research and analysis of various asserted USDA claims, potential tracing issues on cash, implications of same upon [REDACTED].	2.70	1,417.50
08/25/2023	HMJ	Review and analysis of USDA dealer trust claims, supporting documentation, USDA analysis, and grounds for allowance/disallowance(2.7); Further research and analysis of [REDACTED] on Dealer Trust claims to various categories of cattle transactions in case(2.5); Pull/summarize selected cases related to same for Trustee consideration [REDACTED](1.0).	6.20	3,255.00
08/26/2023	HMJ	Review various issues related to asserted Dealer Trust claims and tracing in preparation for conference with Trustee(1.0); Lengthy conference with Trustee on same(1.4).	2.40	1,260.00
08/28/2023	HMJ	Several correspondence and conferences with Trustee related to USDA and POC claims, supporting documentation, [REDACTED] issues, and [REDACTED].	1.60	840.00
08/29/2023	HMJ	Outline items for conference call with USDA counsel on asserted claims and trust claims, follow up with Trustee on same.	1.00	525.00
	HMJ	Analysis of options for dealing with USDA claims in main case procedurally and bar dates, review similar procedures used in prior cases for PACA claims.	1.00	525.00
	HMJ	Conference with LeBas on USDA claimant issues and position re allowance and trust fund(.4); Follow up with Trustee re same(.3).	0.70	367.50
	HMJ	Prepare for and attend initial conference with USDA counsel on general claim		

USDA Claim Issues

			Hours	
		and case issues.	0.80	420.00
	FP	Analyze and outline issues related to Packers and Stockyard Act (.4); Research enforcement of Packers Act (1.9); Analyze and outline analysis of Packers Act research (.6); Research bar date for Packers and Stockyard Act claims (.8)	3.70	1,017.50
08/30/2023	HMJ	Prepare for and attend further conferences with Trustee and USDA counsel on USDA position on claim tracing and allowance.	0.80	420.00
08/31/2023	HMJ	Research and contact various cattle trade group counsel related to positions on USDA claim trust issues.	1.80	945.00
	HMJ	Outline items for call with USDA counsel with Trustee(1.0); Attend conference with USDA counsel on additional asserted claims and issues in case(.8).	1.80	945.00
	HMJ	Several conferences with asserted USDA creditors on positions related to pursuit of USDA claim recoveries and allowance.	1.20	630.00
	HMJ	Prepare for and attend lengthy conference call with USDA parties on issues surrounding and arising from asserted and disputed USDA claims and tracing issues.	1.80	945.00
09/01/2023	HMJ	Further research and analysis of potential impact of USDA arguments and issues on [REDACTED] (2.5); Prepare for and attend lengthy conference with Trustee on same(.9).	3.40	1,785.00
09/06/2023	HMJ	Research and analysis of Dealer Trust Act enforcement triggers with USDA(1.8); Prepare demand letter on USDA related to same(.7); Several correspondence and lengthy conferences with Trustee on USDA issues(.6); Correspondence and conference with USDA parties on same(1.0); Prepare for and attend conference with Rabo counsel on related case issues (.5).	4.60	2,415.00
09/07/2023	HMJ	Prepare for and attend conference with Trustee on USDA trust issues and related case items.	0.80	420.00
09/08/2023	BR	Examine case law addressing the use of receivers to manage assets and claims under the Dealer Trust Act and similar federal statutes, and cases [REDACTED].	3.30	1,155.00
	HMJ	Analysis and outline of potential receivership, special master, or other procedural solutions for administration of Dealer Trust issues.	1.00	525.00
09/11/2023	FP	Examine cases regarding PACA receiver fees (.6)	0.60	165.00
09/12/2023	HMJ	Further research into receivership and other procedural tools for administration of Dealer Trust issues.	1.60	840.00
	HMJ	Correspondence with Trustee on various USDA Dealer Trust issues.	0.50	262.50
	FP	Examine cases regarding PACA [REDACTED] (3.1)	3.10	852.50
09/13/2023	HMJ	Outline of potential issues and arguments to raise in USDA Claim Notice/Motion to be filed in main case(1.0); Follow up with Trustee on		

USDA Claim Issues

		same(.3).	Hours 1.30	682.50
	FP	Examine cases regarding PACA [REDACTED] (2.0)	2.00	550.00
	HMJ	Outline of potential issues and arguments to raise in USDA Claim Notice/Motion to be filed in main case(1.0); Follow up with Trustee on same(.3).	1.30	682.50
09/15/2023	HMJ	Review various USDA Dealer Trust issues in preparation for conference with Trustee(.8); Conference with Trustee on same(.6); Draft/revise case background, arguments and issues for Dealer Trust Claim Notice/Motion(2.2).	3.60	1,890.00
09/18/2023	HMJ	Prepare revisions/additional argument and issues for USDA trust claims notice/motion, follow up with Trustee on same.	1.80	945.00
09/21/2023	HMJ	Correspondence and conference with parties on USDA claim issues.	1.20	630.00
09/22/2023	HMJ	Review and comment on final form USDA Notice/Claim pleadings(.7); Follow up with parties on same(.8).	1.50	787.50
09/28/2023	HMJ	Several correspondence and conferences with parties on various issues raised in USDA Notice/Motion.	1.20	630.00
10/10/2023	HMJ	Lengthy review and analysis of various documentation on USDA claims, proposed allowance/disallowance and USDA investigation, implications for same upon [REDACTED], and implications of same upon cattle proceeds [REDACTED] (3.6); Prepare for and attend lengthy conference with Trustee on various USDA issues and potential implications of same upon various case issues(1.4).	5.00	2,625.00
10/11/2023	HMJ	Several correspondence and conferences with parties related to USDA Claim hearing(1.0); Prepare for and hearing on various USDA Claim issues(1.2).	2.20	1,155.00
10/24/2023	HMJ	Review updated USDA materials and related documentation.	0.50	262.50
11/09/2023	HMJ	Lengthy analysis and outline of documents and various issues with interplay of asserted dealer trust claims [REDACTED]	1.70	892.50
	HMJ	Prepare for and attend conference on various asserted USDA claims and potential options for handling of same in connection with cash tracing and allowance.	1.00	525.00
12/11/2023	BR	Researched 1019 settlement agreements for similar amounts to use in pleading.	2.20	440.00
12/12/2023	BR	Researched 9019 settlement agreements for agreements of similar amounts.	1.40	280.00
12/13/2023	BR	Researched 9019 settlement agreement cases for similar settlement amounts.	1.00	200.00
12/14/2023	BR	Researched 9019 settlement agreement cases for cases involving similar amounts.	1.00	200.00
		For Current Services Rendered	80.30	37,410.00

Client No: 2322-0003M
Invoice No: 507524

USDA Claim Issues

Recapitulation			
<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Brent Rodine	3.30	\$350.00	\$1,155.00
Hudson M. Jobe	62.00	525.00	32,550.00
Frank Patel	9.40	275.00	2,585.00
Braden Reid	5.60	200.00	1,120.00

Total Current Work 37,410.00

Balance Due \$37,410.00

NOTE: PLEASE REFERENCE THE CLIENT MATTER NO. WITH PAYMENT



Tax ID: 75-2459334

Kent Ries, Chapter 7 Trustee of McClain Debtors

Invoice Date: March 31, 2024
 Invoice No. 507525
 Client No. 2322.0004
 Page: 1

Investigation of Possible Estate Claims

ITEMIZED SERVICES BILL

			Hours	
06/21/2023	HMJ	Brief analysis and outline of potential claims against Rabo based upon generalized allegations of parties.	0.80	420.00
06/26/2023	HMJ	Comprehensive review of initial background documents provided by parties and various party allegations regarding Debtors' operations, creditors, allegations regarding cattle reclamation, fraud and Ponzi scheme allegations, and various potential estate claims(4.8); Analysis and outline of potential estate claims and issues for investigation by trustee, follow up with trustee on same(1.2).	6.00	3,150.00
06/28/2023	HMJ	Prepare for and attend lengthy conferences with potential local KY counsel.	1.50	787.50
06/30/2023	HMJ	Further correspondence and conferences with potential KY counsel.	1.40	735.00
07/07/2023	HMJ	Review Northland Financial Services, LLC motion for relief from stay and related documents for possible estate claims, related order issues on same, follow up with trustee.	1.00	525.00
07/11/2023	HMJ	Comprehensive review of prior discovery to date by various parties and related documentation attached to claims to date(2.0); Several conferences with parties related to same and various allegations and potential estate claims(1.4).	3.40	1,785.00
	HMJ	Review Rabo loan documents(.8); Analysis of potential titled vehicle claims(.7); Follow up with Trustee on same and related case issues(.5).	2.00	1,050.00
07/13/2023	HMJ	Lengthy conferences and correspondence with parties identifying debtor records and related issues; coordaining plans for retrieval of same(3.0); Research and analysis of related custody issues and related concerns regarding admissibility in later use at trial(1.8); Follow up with Trustee on same and related case issues (.3).	5.10	2,677.50
07/17/2023	HMJ	Initial research and analysis of potential claims related to [REDACTED] [REDACTED] debtor operations and funding, related case documents, and overall		

Investigation of Possible Estate Claims

			Hours	
		background issues related to debtor operations [REDACTED]	4.30	2,257.50
07/19/2023	HMJ	Lengthy research and review of Debtors land holdings, leased and owned property, related market values, lien issues, and related concerns on Trustee administration of same(2.0); Negotiations with Trustee and Rabo concerning potential surcharge arrangements for sale of real property(1.0).	3.00	1,575.00
	HMJ	Prepare for and attend lengthy conference with Trustee on various case issues and potential estate claims for further investigation.	1.20	630.00
07/27/2023	HMJ	Draft discovery requests to MTV movants on possible estate claims, outline areas for possible deposition and further discovery.	1.40	735.00
07/28/2023	HMJ	Extensive review and analysis of initial documentation on various transfers and prepetition dealings of various parties, possible estate claims related to same(2.7); Correspondence and conferences with parties on same and general background of debtor cattle dealings and investors(.8).	3.50	1,837.50
	HMJ	Review 2B documents and bankruptcy pleadings, outline items for further investigation(.9); Correspondence to 2B counsel on related case deadlines(.1).	1.00	525.00
	HMJ	Prepare documents for Trustee on various potential estate claims and issues, including 2B matters.	0.80	420.00
08/01/2023	HMJ	Review prior Rabo discovery and attend conference with Rabo counsel on same and related case issues.	1.00	525.00
	HMJ	Coordinate transmission of Focus turnover of Debtors' records.	0.40	210.00
	HMJ	Emails with Rabo and CRO regarding pre-petition transfers and related banking records.	0.20	105.00
08/02/2023	HMJ	Continue working with parties on turnover of various discovery documents.	1.80	945.00
08/04/2023	HMJ	Conferences and correspondence with counsel for 2B and Rabo on case issues and deadlines.	0.30	157.50
08/08/2023	HMJ	Initial review of extensive Goad/Moreland production(2.5); Follow up with counsel for Rabo on same(.1).	2.60	1,365.00
08/09/2023	HMJ	Review 2B deadlines(.4); Prepare draft POC and Addendum for same in 2B case(.8); Prepare Motion to Extend in 2B case(.9); Conference with Rabo counsel on same(.3); Correspondence with parties on same(.5).	2.90	1,522.50
	HMJ	Several correspondence with parties regarding Debtor records, computers, and related turnover issues.	0.80	420.00
	HMJ	Conference call with Trustee regarding various case issues.	0.50	262.50
08/10/2023	HMJ	Revise 2B pleadings/claims(.5); Correspondence with parties on same(.5).	1.00	525.00
	HMJ	Lengthy call with LF re cash tracing and related case issues.	0.50	262.50
	HMJ	Prepare 2B Proofs of Claim and related documentation.	0.80	420.00

Investigation of Possible Estate Claims

			Hours	
08/18/2023	HMJ	Initial review and analysis of voluminous debtor records from Focus- banking information, various contracts and transfers, various correspondence and other contracts(3.5); Outline items for further research and investigation related to potential claims(1.0).	4.50	2,362.50
	HMJ	Several correspondence with trustee and accountants related to claim investigation and various issues with banking records.	0.70	367.50
	HMJ	Prepare for and attend lengthy conference with accountants on general case issues and claim investigation.	0.90	472.50
08/22/2023	HMJ	Outline additional background documents for accountant use in cash tracing and claim investigation.	1.00	525.00
08/23/2023	HMJ	Review documents from Keeling related to cattle issues; follow up with Keeling on same(.5); Conference call with LeBas regarding cattle sales(.3); Correspondence with Trustee on same(.2).	1.00	525.00
08/24/2023	HMJ	Review of Focus document inventory and related documents(2.0); Prepare for and attend lengthy call with accountants on Focus documents(.8); Follow up with Trustee on same(.3).	3.10	1,627.50
	HMJ	Further review of Goad/Moreland discovery and identification of possible relevant documents to claim investigation.	1.80	945.00
	HMJ	General analysis and outline of various case matters for Trustee update related to investigation into further records, prepetition deadlines, and estate claims.	1.00	525.00
08/25/2023	GMS	Review and initial analysis of Packers and Stockyards Act, McLean case interpreting provisions of Packers and Stockyards Act, and next steps;	0.80	360.00
08/28/2023	HMJ	Further review of extensive documentation and general course of dealing of asserted Dealer Trust claims, investment structure, and related issues to pre-petition transfers by and between Debtors and investors([REDACTED]) (1.0).	4.00	2,100.00
	HMJ	Prepare for and attend lengthy conference with Trustee on various case issues.	1.30	682.50
08/29/2023	HMJ	Research issues related to cash tracing on investment and cattle funds, related Rabo lien issues, and USDA claims(2.4); Correspondence with parties on various issues related to cash tracing on investment and cattle funds, related Rabo lien issues, and USDA claims(.6).	3.00	1,575.00
	HMJ	Coordinate setting of 2B extension motion and related notice.	0.20	105.00
08/30/2023	HMJ	Further review and analysis of investor agreements and asserted USDA claims and related case issues specific to Ch. 5 claims/defenses arising from possible USDA Claims.	3.00	1,575.00
09/01/2023	GMS	Review and analysis of Packers and Stockyards Act including applicable trust provisions to evaluate alternatives to proceed;	0.30	135.00

Investigation of Possible Estate Claims

			Hours	
	GMS	Conference with Mr. Jobe regarding categories of claimants, implication of Packers and Stockyards Act application, and plan for proceeding;	0.60	270.00
09/05/2023	HMJ	Prepare for and attend conference with Trustee on potential estate claims and related case issues.	0.60	315.00
09/12/2023	HMJ	Review various documents related to cash tracing, [REDACTED] and other and banking issues(2.6); Brief research on perfection issues related to same(1.0); Follow up with LF regarding cash tracing and banking issues(.5).	4.10	2,152.50
09/13/2023	HMJ	Prepare for and attend conference with LF on cash tracing and banking issues.	1.50	787.50
09/20/2023	HMJ	Review and outline pending 2B matters, prepare summary of same for Trustee.	0.80	420.00
09/21/2023	HMJ	Further review and analysis of various Proofs of Claim, USDA claim documentation, and related documents on investment scheme of Debtors and flow of funds.	2.70	1,417.50
10/11/2023	HMJ	Review pleadings in 2B case and prepare objection to confirmation of plan to incorporate issues with respect to ongoing investigation and claims.	1.20	630.00
	HMJ	Prepare for and attend conference with Trustee on various case issues and potential estate avoidance claims.	0.90	472.50
10/12/2023	HMJ	Prepare for and attend conference with Trustee on various case issues and potential estate avoidance claims.	0.80	420.00
10/13/2023	HMJ	Review and analysis of various documents and case issues in preparation for conference with Rabo(1.2); Attend lengthy conference with Rabo on various case issues and potential estate claims(.8).	2.00	1,050.00
	HMJ	Several conferences with Trustee on potential estate claims and related case issues.	1.00	525.00
10/16/2023	HMJ	Prepare and negotiate agreed order on 2B deadlines with parties.	1.20	630.00
10/17/2023	HMJ	Further review and analysis of voluminous documents related to operations of Debtors and cash tracing issues(2.7); Prepare for and attend conference with accountants on same and related case issues(1.0); Follow up with Trustee on same and related case issues(.3).	4.00	2,100.00
10/18/2023	HMJ	Further extensive review and analysis of voluminous documents related to operations of Debtors and cash tracing issues(3.5); Several correspondence and conferences with parties related to same and additional documentations needed for further cash tracing(1.2).	4.70	2,467.50
10/20/2023	HMJ	Prepare for and attend conference with Trustee on 2B, USDA, and various case issues and investigation of potential claims.	1.20	630.00
	HMJ	Several correspondence and conference with parties coordinating 2B hearing on deadlines and plan, related case issues.	0.50	262.50

Investigation of Possible Estate Claims

			Hours	
10/24/2023	HMJ	Further investigation and analysis into backup documentation and explanation of dealings of various asserted USDA claimants, positions of parties on related cash tracing issues, and various outstanding issues and implications of same upon allowance of claims and effect thereof [REDACTED] (3.2); Follow up with Trustee on same(.5).	3.70	1,942.50
10/26/2023	HMJ	Review 2B Motion to Sell, analysis of potential estate claims or lack thereof related to same(.4); Follow up with Trustee on same(.2).	0.60	315.00
	HMJ	Review various correspondence with proposed claim buyer and conference with counsel for buyer on same.	0.60	315.00
10/30/2023	HMJ	Prepare for and attend conference with Trustee on various case issues including avoidance claims.	0.50	262.50
10/31/2023	HMJ	Further review and analysis of various cash tracing issues and records related to potential avoidance claims and debtor transfers.	2.60	1,365.00
11/02/2023	HMJ	Lengthy analysis and outline of bank account documents, outstanding additional information needed, and discovery targets(2.0); Prepare summary of same(.8); Negotiations with Mechanics Bank(.3).	3.10	1,627.50
	HMJ	Analysis and outline of additional items needed from Rabo related to banking and transactional information(1.6); Prepare summary of same(.4); Follow up with Rabo counsel on same(.1).	2.10	1,102.50
11/03/2023	HMJ	Review various outstanding discovery and other information relative to Debtor records and prior Rabo discovery, follow up with Rabo counsel on same.	1.00	525.00
11/08/2023	HMJ	Brief additional review of cattle reclamation issues, documents, and potential estate claims or lack thereof(1.4); Outline next steps and possible options to address same in context of bankruptcy estate(.6).	2.00	1,050.00
11/09/2023	GMS	Review and analysis of TSCRA investigation reports and evaluate discovery and information needed in connection with investigations;	0.30	135.00
	GMS	Review and analysis of bankruptcy proof of claims and compare and contrast claims to USDA Trust claims analysis and TSCRA investigation reports to assist with evaluation of next steps and options;	1.30	585.00
	GMS	Telephone conferences and correspondences with Mr. Jobe regarding bankruptcy proof of claims, USDA Trust claims analysis spreadsheet, TSCRA investigation reports, and options to proceed;	0.50	225.00
11/10/2023	GMS	Correspondences regarding TSCRA documents related to seized and reclaimed cattle and whether equivalent documentation exists for any seized and reclaimed cattle in Kentucky;	0.20	90.00
	HMJ	Further analysis of issues related to cattle reclamation issues and possible claims(.8); Follow up with Trustee on same (.2); Correspondence with Rabo counsel on same(.1).	1.10	577.50
	HMJ	Lengthy conference call with Trustee on various issues related to estate claims and other case issues.	1.80	945.00

Investigation of Possible Estate Claims

			Hours	
11/21/2023	HMJ	Continue review and analysis of banking issues and potential estate claims, additional items needed for same(1.4); Correspondence to Mechanics Bank on same(.1).	1.50	787.50
11/29/2023	HMJ	Review amended 2B plan for implications on possible estate claims(.4); Follow up with 2B counsel on same(.2).	0.60	315.00
11/30/2023	HMJ	Review various issues and documents related to [REDACTED] (1.4); Several correspondence and conferences with parties on same(.6).	2.00	1,050.00
	HMJ	Conference with Trustee on potential estate claims and related case issues.	0.60	315.00
	HMJ	Review additional discovery requests filed by Rabo and Thorlakson(.3); Continue review and analysis of various obtained discovery, objections thereto, and additional items needed(1.2).	1.50	787.50
12/04/2023	GMS	Attend meeting with Trustee Mr. Ries and forensic accounts regarding review of financial documents and plan for proceeding;	1.80	810.00
	GMS	Review and analysis of RAF's Complaint for Declaratory Relief related to lien priority and alleged application of Dealer Trust Statute to assist with evaluation of options to proceed;	0.20	90.00
	HMJ	Prepare for and attend meeting with Trustee and accountants on various case issues and investigation of estate claims.	1.80	945.00
12/28/2023	HMJ	Review updated Mechanics banking documents and issues with remote detail, follow up with parties on same.	1.60	840.00
01/04/2024	HMJ	Review correspondence re offer on sale of estate claims, follow up with Trustee on same.	0.20	105.00
01/05/2024	HMJ	Review of extensive updated banking records and other discovery materials related to cash tracing and related case issues(2.2), Follow up with accountants on same and plans for further review(.3).	2.50	1,312.50
01/12/2024	HMJ	Review various issues with CFSB production and discovery(1.4); Correspondence with parties on same(.3); Attend conference call with CFSB counsel(.5); Follow up with Rabo counsel on related banking and other document issues(.6); Prepare summary of outstanding CFSB issues for parties(.4).	3.20	1,680.00
01/23/2024	BR	Researched applicability of work product/attorney-client privilege as it relates to [REDACTED]	1.50	300.00
	HMJ	Further review and analysis of prior discovery and outline of additional items needed.	2.50	1,312.50
01/25/2024	HMJ	Conference call with Trustee regarding various case issues.	0.50	262.50
01/26/2024	BR	Researched applicability of work product/attorney-client privilege as it relates to [REDACTED]	1.80	360.00

Investigation of Possible Estate Claims

			Hours	
01/29/2024	BR	Pulled filings from PACER on NJ case relating to third-party forensic accountants and privilege questions.	1.00	200.00
01/30/2024	HMJ	Further review and analysis of claims and supporting documentation(1.2); Analysis of options for obtaining additional operational documents related to investor dealings and other cattle operations(.8); Prepare draft of discovery requests for USDA claimants(1.5); Compile/analyze comparison information of USDA claims, Proofs of Claims, and other creditors(1.5).; Prepare draft of Motion for 2004 Exam on USDA Claimants(1.2).	6.20	3,255.00
01/31/2024	HMJ	Further review and analysis of comparison information of USDA claims, Proofs of Claims, and other creditors(1.5); Drafting/revisions to proposed USDA Claimant discovery request and motion(1.6); Follow up with Trustee on same(.2); Follow up with Rabo counsel on same(.1); Compile and sort service list information and options for USDA parties(1.0).	4.40	2,310.00
02/06/2024	HMJ	Prepare amended 2B stipulation on deadlines and negotiate same.	0.50	262.50
	HMJ	Further review, analysis, and sorting of claimant information and service options/plan.	1.50	787.50
	HMJ	Research and confirm various legal issues and options for 2004 scope and procedure(1.2); Review and outline all prior 2004 proceedings(.8); Outline additional discovery needed regarding confirmation of prior exchange of materials(.7); Follow up with Rabo, Thorlakson, settling defendants, and other parties regarding summary of same and comments thereto(.5); Draft similar motion for 2004 examination and request for discovery on other parties filing Proofs of Claim but not USDA claims(1.3); Draft Motion for 2004 Examination related to prior discovery materials (1.0).	5.50	2,887.50
02/07/2024	GMS	Evaluate other pending related lawsuit and next steps, including need for summary of the lawsuits and process to complete [REDACTED] assessment;	0.40	180.00
	HMJ	Finalize drafting/revisions to Motions for 2004 Examination of USDA claimants and prior discovery(1.0); Coordinate submission of same and hearing setting(.4); Review file on life insurance and outline outstanding issues and information needed related to life insurance claims(2.0); Prepare Motion for 2004 Examination and request for discovery related to life insurance(1.0); Research service issues and compile service information for carriers(1.2); Follow up with T. Farmer and C. Bird on life insurance discovery(.1).	5.70	2,992.50
02/08/2024	HMJ	Finalize revisions to life insurance discovery and coordinate submission and setting of same(1.0); Finalize revisions to non USDA claimant creditor discovery and coordinate submission and setting of same(.5); Outline plans for service methods and communications for USDA parties, draft email to claimants on same(.7); Several correspondence with parties related to discovery issues and items needed (.8).	3.00	1,575.00
02/13/2024	HMJ	Further review and outline of banking records and issues, including outstanding items needed(1.4); Prepare draft of additional banking discovery(1.8); Research and confirm issues with [REDACTED] and allowable discovery(1.2); Follow up with accountants regarding banking discovery(.3)..	4.70	2,467.50

Investigation of Possible Estate Claims

			Hours	
02/14/2024	GMS	Correspondence with Trustee regarding motion for discovery from banks and plan for proceeding;	0.10	45.00
	GMS	Review and analysis of Rabo's Adversary proceeding and separate lawsuit filed in Western District of Kentucky, and begin preparation of [REDACTED];	0.90	405.00
02/15/2024	HMJ	Research and review of various legal issues presented in Rabo lawsuit re USDA claims and options for addressing same(1.8); Follow up with Rabo re scheduling order(.1).	1.90	997.50
	HMJ	Brief review of updated pleadings in pending 2B lawsuits and other Rabo state court litigation.	1.00	525.00
02/16/2024	HMJ	Prepare draft answer for Trustee in Rabo USDA adversary proceeding(1.2); Prepare draft stipulation with Rabo in USDA lawsuit re additional claims(.4); Analysis and outline of additional cash tracing items needed for Trustee answer and follow up with Trustee and accountants on same(.5).	2.10	1,102.50
02/18/2024	GMS	Prepare memorandum summarizing [REDACTED] lawsuits, [REDACTED]	0.60	270.00
	GMS	Review and analysis of draft stipulation concerning other claims [REDACTED]	0.20	90.00
02/19/2024	HMJ	Further review and analysis of additional banking activity and possible discovery needed on same(1.8); Continue drafting of overall outline and motion for additional banking discovery(1.6).	3.40	1,785.00
	HMJ	Compile and review updated caselaw on [REDACTED] (1.0); Analysis and outline of issues and options to address in [REDACTED] motion and order, implications of same upon [REDACTED] (.8); Draft [REDACTED] (1.3); [REDACTED] (.5).	3.60	1,890.00
02/20/2024	GMS	Review and analysis of Rabo's pleadings, including Complaint and First Amended Complaint, filed as adversary proceeding and separate lawsuit filed in WD Kentucky and [REDACTED];	2.60	1,170.00
	GMS	Correspondence with Rabo's counsel regarding proposed stipulation related to waiver of defenses for compulsory counterclaims and revise proposed stipulation;	0.50	225.00
	GMS	Perform legal research regarding w [REDACTED];	0.20	90.00
	HMJ	Further drafting/revisions to [REDACTED] (1.2); Follow up with Trustee on same(.2).	1.40	735.00
	HMJ	Correspondence with parties on issues related to reclamation and other cattle claims.	0.60	315.00
	HMJ	Outline general framework for case law issues on [REDACTED] claims.	1.00	525.00

Investigation of Possible Estate Claims

			Hours	
02/21/2024	HMJ	Correspondence and conferences with parties on various issues and concerns related to [REDACTED] issues(.7); Research and review records and issues presented with same(.8).	1.50	787.50
02/22/2024	BR	Analysis of statutes and case law addressing [REDACTED] fraudulent transfer claims (3.3); Analysis of case law addressing [REDACTED] secured lenders [REDACTED] (2.8).	6.10	2,135.00
	HMJ	Further review and analysis of various concerns raised with respect to [REDACTED] and related records(1.0); Correspondence with Trustee on same(.4).	1.40	735.00
	HMJ	Continue review and analysis of various additional banks and records, and interplay/involvement of same with Debtors operations(1.8); Follow up with accountants on same(.3).	2.10	1,102.50
02/23/2024	BR	Analysis of how the [REDACTED] 11 USC 548 and the Texas Uniform Fraudulent Transfer Act, and the [REDACTED] opinion addressing the same issue.	0.80	280.00
02/26/2024	BR	Prepare summary of Fifth Circuit case law addressing [REDACTED]	2.20	770.00
02/27/2024	BR	Prepare summary of Fifth Circuit case law addressing [REDACTED]	2.30	805.00
	HMJ	Review potential issues presented by Rabo seeking to lift stay on cattle claims(.8); Review issues and cases related to secured lender lien issues in [REDACTED] analyze potential Rabo claims concerning same(1.2).	2.00	1,050.00
	HMJ	Review Rabo loan documents and file materials provided(.8); Outline additional materials needed from Rabo(.7); Follow up with Rabo on discovery materials(.3).	1.80	945.00
02/28/2024	BR	Prepare detailed summary of Fifth Circuit cases addressing t[REDACTED] actual intent [REDACTED] transactions in the ordinary course of business, and the impact t[REDACTED] preference actions under 11 U.S.C. 547.	3.80	1,330.00
	HMJ	Further review and analysis of prior discovery and file materials, outline of additional materials needed(1.0); Follow up with Rabo counsel regarding document issues(.3).	1.30	682.50
02/29/2024	BR	Prepare detailed summary of Fifth Circuit cases addressing t[REDACTED] fraudulent transfer actions under 11 U.S.C. 548 and the Texas Uniform Fraudulent Transfer act.	5.50	1,925.00
03/01/2024	HMJ	Further review and analysis of prior discovery and file materials, outline of additional materials needed(1.5); Prepare for and attend lengthy conferences with creditors on additional documents and information needed(2.0); Follow up		

Investigation of Possible Estate Claims

			Hours	
		with Rabo counsel on options for dealing with cattle claims(.1).	3.60	1,890.00
03/04/2024	HMJ	Negotiations with counsel for Chelsea McClain re discovery issues(.7); Review numerous discovery objections and outline general reply points for same(1.0); Call to Rabo on discovery issues(.3); Compile relevant dealer trust act claim issues relevant to 2004 discovery request and reply(.5); Brief review and outline of burden/broad objections and issues needed to address in reply(.5); Research case law on subpoena issues in 2004 exam(.9); Brief review and outline of interrogatory objections and issues needed to address in reply(.4).	4.30	2,257.50
03/06/2024	HMJ	Analysis and outline of case funding issues related to [REDACTED] (2.2); Conference with [REDACTED] on same(.6).	2.80	1,470.00
03/08/2024	HMJ	Further analysis of issues with Rabo USDA suit and stipulation on other claims, revisions thereto(.5); Follow up with Trustee on same(.3); Review outstanding accounting issues in answer to Rabo USDA lawsuit and follow up with Trustee on same(.5); Lengthy conference with Trustee regarding Rabo USDA lawsuit and concerns in same relative to [REDACTED] estate claims [REDACTED] (1.0); Review/revisions to proposed scheduling order(.4); Follow up with Rabo on various issues in Rabo USDA lawsuit(.3).	3.00	1,575.00
03/11/2024	HMJ	General analysis and outline of various issues related to banking and cattle activity to address at contested hearing on discovery(1.5); Review selected USDA claims and supporting documentation and various aspects of claims for use at contested hearing on discovery(2.0); Compile service documents on life insurance discovery(.5); Compile documents and comprehensive analysis of USDA claimants and Proofs of Claims for use at contested hearing on discovery(.7); Review banking activity and identify selected statements to use at contested hearing on discovery(.8); Finalize exhibits for contested hearing on discovery(1.0); Draft/revise witness and exhibit list for contested hearing on discovery(.5).	7.00	3,675.00
03/12/2024	HMJ	Further analysis and outline of case [REDACTED] (8); Conference with [REDACTED] on same(.7).	1.50	787.50
03/13/2024	HMJ	Review Rabo motion to lift stay/abandon on cattle issues(.2); Follow up with Trustee on same and potential estate claim issues(.3).	0.50	262.50
	HMJ	Conference calls and correspondence with LeBas, Trustee, settling life insurance parties, MAP, and Lovell regarding contested discovery issues(2.2); Review updated case law and analysis on various Ponzi scheme issues and avoidance claims relevant to contested discovery(1.4); Review case law and analysis of various technical discovery arguments on burdens and interrogatory(1.0); Prepare extensive Reply brief to numerous objections to trustee discovery(4.0).	8.60	4,515.00
03/14/2024	HMJ	Review/revise comprehensive Reply brief on discovery issues(1.0); General review of documents and issues in preparation for contested discovery hearing(1.2); Conference with Trustee in preparation for same(.8); Attend lengthy docket call on contested discovery and coordinate hearing setting and appearance procedures(2.0).	5.00	2,625.00

Client No: 2322-0004M
Invoice No: 507525

Investigation of Possible Estate Claims

			Hours	
03/15/2024	HMJ	Review issues raised by Trustee related to discovery hearing and documents related thereto(.4), follow up with Trustee on same (.1); Outline proposed admission scope issues for exhibits and follow up with parties on same(.4).	0.90	472.50
03/18/2024	HMJ	General review of documents and issues in preparation for contested discovery hearing(1.0); Attend lengthy discovery hearing(3.0).	4.00	2,100.00
03/21/2024	HMJ	Review trustee response to Rabo motion to abandon/lift stay on cattle issues(.2); Prepare comments thereto(.4).	0.60	315.00
	HMJ	Extensive revisions and negotiations with Rabo on proposed scheduling order, motion to approve scheduling order, and stipulation on other claims at issue in the Rabo USDA claimant adversary proceeding.	2.00	1,050.00
03/22/2024	HMJ	Review/revise intervention pleadings in 2B lawsuit and related issues(.7); Prepare revised 2B stipulation on dates(.3); Negotiate same with Trustee and 2B counsel(.5).	1.50	787.50
03/25/2024	HMJ	Outline documents and issues related to cash tracing, operational documents, Ponzi scheme issues, avoidance claims, and related case issues(2.2); Conference with accountants on documents and issues related to cash tracing, operational documents, Ponzi scheme issues, avoidance claims, and related case issues(1.0).	3.20	1,680.00
03/28/2024	HMJ	Brief review of new claims and issues in HTLF/2B/Rabo lawsuit, removal of same, and potential estate claims and implications in proceeding(1.0); Correspondence with Trustee on same(.3).	1.30	682.50
03/29/2024	HMJ	Comprehensive review of various documents and case issues in preparation for extensive conference with M. Goad(2.2); Conference with accountants in advance of M. Goad conference on same(.6); Attend lengthy conference with M. Goad on global case issues, background, and Debtors operations(2.8); Outline items from call and items for further follow up and investigation(.8).	6.40	3,360.00
		For Current Services Rendered	288.80	145,737.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Brent Rodine	20.70	\$350.00	\$7,245.00
Hudson M. Jobe	252.30	525.00	132,457.50
Gregory M. Sudbury	11.50	450.00	5,175.00
Braden Reid	4.30	200.00	860.00

Photocopies	5.20
Postage	157.93
Pacer Service	812.90
Total Expenses Thru 03/31/2024	976.03
Total Current Work	146,713.53

Client No: 2322-0004M
Invoice No: 507525

Investigation of Possible Estate Claims

Balance Due

\$146,713.53

NOTE: PLEASE REFERENCE THE CLIENT MATTER NO. WITH PAYMENT



Tax ID: 75-2459334

Kent Ries, Chapter 7 Trustee of McClain Debtors

Invoice Date: March 31, 2024
 Invoice No. 507526
 Client No. 2322.0005
 Page: 1

Life Insurance Issues

ITEMIZED SERVICES BILL

			Hours	
09/04/2023	HMJ	Lengthy review and analysis of various documentation related to life insurance policies, payment of proceeds, payment of premiums, various cash account tracing issues, and other documents potentially relevant to estate claims for Brian McClain life insurance proceeds(3.5); Comprehensive research and analysis of various case law regarding f [REDACTED] relevant to estate claims related to McClain life insurance proceeds(5.5).	9.00	4,725.00
09/05/2023	HMJ	Further research and analysis of potential claims related to life insurance proceeds and premiums(3.5); Outline documents, issues and argument for Trustee related to potential life insurance claims(2.2).	5.70	2,992.50
09/08/2023	HMJ	Review various issues and claims involving Goad/Moreland parties and venue issues, attend conference with T. Farmer on same (.9); Further research and investigation into life insurance premium payments, cash tracing, and possible estate claims related to life insurance (3.6).	4.50	2,362.50
09/15/2023	HMJ	Research and review various forms and agreements related to [REDACTED] related to potential life insurance settlement(1.8); Research and review various [REDACTED] claims(1.4); Outline prior policies and prepare draft of life insurance settlement agreement and related documents(2.2).	5.40	2,835.00
09/18/2023	HMJ	Further drafting/revisions to life insurance settlement agreement.	1.00	525.00
09/19/2023	HMJ	Various correspondence and conference with parties negotiating aspects and terms of life insurance settlement.	1.20	630.00
09/21/2023	HMJ	Correspondence and conferences with parties on life insurance settlement agreement.	0.80	420.00
09/28/2023	HMJ	Negotiations with parties on life insurance settlement, including several correspondence and conferences with parties and revisions to agreement.	1.80	945.00

Client No: 2322-0005M
Invoice No: 507526

Life Insurance Issues

			Hours	
10/02/2023	HMJ	Various correspondence and conferences coordinating resetting of MTV and related deadlines and issues with same and potential Goad/Moreland settlement, including related discovery.	1.50	787.50
	HMJ	Lengthy review and analysis of various cash tracing and related documentation related to possible claims for life insurance proceeds, and related evidentiary issues related to alleged [REDACTED] for use in further analysis/investigation/and possible settlement of claims for life insurance proceeds.	3.20	1,680.00
10/03/2023	HMJ	Prepare for and attend settlement conference with Goad/Moreland counsel on potential avoidance claims(1.0); Further and review of potential release/cooperation mechanisms for settlement(1.2); Extensive review of various debtor records for evidence of involvement of Goad in operations for purpose of possible claims and also benefits of coordination provisions in settlement agreement(2.8).	5.00	2,625.00
10/05/2023	HMJ	Prepare for and attend settlement conference with Goad/Moreland counsel on potential avoidance claims(.9); Lengthy research and analysis of various documentation and issues related to potential avoidance claims involving Goad/Moreland and immediate family members related to [REDACTED] in potential Goad/Moreland settlement(4.5).	5.40	2,835.00
10/09/2023	HMJ	Outline issues and possible terms of settlement of Goad/Moreland life insurance avoidance claims for trustee, follow up with trustee on same and preparations for settlement conference(1.6); Prepare for and attend settlement conference with counsel for Goad/Moreland on life insurance claims(.8); Post-conference correspondence and discussions with Trustee on same(.6).	3.00	1,575.00
10/16/2023	HMJ	Review updated background documents and information on life insurance proceeds and related estate claims(.8); Ongoing negotiations with Trustee and counsel for Goad/Moreland on many outstanding material terms of potential Goad/Moreland settlement of avoidance claims and numerous revisions/drafting to underlying documents(3.4).	4.20	2,205.00
	HMJ	Review additional documents related to affiliate transactions and related cash tracing issues for consideration as part of both overall estate claims and specific issues with Goad/Moreland settlement of avoidance claims.	2.30	1,207.50
10/25/2023	HMJ	Further negotiations of Goad/Moreland settlement with Trustee and counsel for Goad/Moreland, and revisions to various material components of same.	2.70	1,417.50
10/26/2023	HMJ	Extensive negotiations and revisions to various components of proposed Goad/Moreland settlement.	2.80	1,470.00
10/30/2023	HMJ	Prepare for and attend lengthy conference with Goad/Moreland and Trustee on possible settlement and related case issues.	0.80	420.00
11/01/2023	HMJ	Substantial revisions to life insurance SA and related negotiations(2.6); Prepare Motion to Approve Life Insurance Settlement(1.5); Prepare order on same(.4); Circulate to parties with comments(.1).	4.60	2,415.00
11/03/2023	HMJ	Several conference calls with Trustee on life insurance settlement and other case issues relative to claim investigations.	0.90	472.50

Life Insurance Issues

			Hours	
	HMJ	Review additional life insurance documents and outstanding issues(1.0); Revisions to life insurance settlement agreement(.4); Follow up with parties on same(.3).	1.70	892.50
11/04/2023	HMJ	Review comments/revisions to life insurance settlement related to case issues and concerns re releases, follow up with trustee on same.	0.80	420.00
11/06/2023	HMJ	Further negotiations/revisions to life insurance settlement.	0.70	367.50
11/07/2023	HMJ	Research and analysis of various issues related to life insurance avoidance claims and release provisions(1.7); Negotiations with parties on life insurance settlement agreement(.8).	2.50	1,312.50
11/08/2023	HMJ	Correspondence with parties on life insurance settlement(.6); Prepare final revisions and execution copies, coordinate execution of same and plans for motion and hearing(1.0).	1.60	840.00
11/13/2023	HMJ	Correspondence and conferences with parties on life insurance settlement and related case issues.	0.80	420.00
11/14/2023	HMJ	Finalize revisions to Motion to Approve Life Insurance Settlement and Settlement Agreement(1.2); Prepare summary of policies and issues for Trustee on same(.5); Review service issues and parties, follow up with Trustee on same(.3).	2.00	1,050.00
11/21/2023	HMJ	Several correspondence and conferences with parties on issues related to hearing on life insurance 9019 motion.	0.80	420.00
12/04/2023	HMJ	Begin analysis and outline of documents and issues for contested hearing on approval of life insurance settlement.	2.20	1,155.00
12/05/2023	HMJ	Conference call with Trustee on life insurance settlement and related case issues.	0.50	262.50
	HMJ	Review and outline various arguments and issues presented by multiple parties' objections to life insurance settlement including requests for discovery.	1.50	787.50
12/06/2023	HMJ	Multiple extended conferences with Trustee, settling defendants, and objecting parties negotiating various aspects of the life insurance settlement related to discovery and release of potentially unknown claim(3.2); Continue review of issues and preparation for contested hearing on life insurance settlement(2.0).	5.20	2,730.00
12/07/2023	HMJ	Conference with counsel for settling defendants on revisions to life insurance settlement relative to scope of release(.4); Conference with Trustee on same(.4); Conference with Rabo counsel on same(.5); Negotiate resolution of discovery issues related to settlement and dropping of unknown claim release, setting of evidentiary hearing(1.0); Coordinate withdrawal of related motion to transfer venue(.1); Appear and announce agreement to court regarding revised scope of release and further briefing procedures and hearing(.5); Prepare revised life insurance settlement draft dropping release of unspecified claims(.7); Follow up with Trustee on same(.1); Further negotiations with parties on release scope issues(1.0).	4.70	2,467.50
12/08/2023	HMJ	Correspondence and conferences with Trustee and settling defendants		

Client No: 2322-0005M
Invoice No: 507526

Life Insurance Issues

			Hours	
		negotiating revisions to life insurance settlement.	1.30	682.50
12/11/2023	HMJ	Conference call with Trustee on various case issues and estate claim investigation and settlements.	0.50	262.50
	HMJ	Several rounds of revisions to life insurance settlement and related communications with Trustee and settling defendants.	2.20	1,155.00
12/12/2023	HMJ	Several correspondence and lengthy conferences with Trustee, objecting creditors, and settling defendants on negotiations related to increasing recovery of life insurance proceeds in return for withdrawal of objections.	2.80	1,470.00
12/13/2023	HMJ	Prepare red-lined life insurance settlement addressing scope of unspecified claims and circulate same for comments(.7); Further correspondence and conferences with Trustee, objecting creditors, and settling defendants on negotiations related to increasing recovery of life insurance proceeds in return for withdrawal of objections (1.6).	2.30	1,207.50
12/14/2023	HMJ	Finalize and coordinate filing of revised life insurance settlement agreement on scope of unspecified claims(.5); Further extensive negotiations with Trustee, objecting creditors, and settling defendants on negotiations related to increasing recovery of life insurance proceeds (1.6).	2.10	1,102.50
12/15/2023	HMJ	Several rounds of revisions and negotiations to life insurance agreement related to proceeds recovery and various other provisions with Trustee, objecting creditors, and settling parties(3.0); Coordinate execution of same(.2).	3.20	1,680.00
12/16/2023	HMJ	Review status of insurance settlement, follow up with parties on same.	0.20	105.00
12/17/2023	HMJ	Emails with Trustee re hearing on life insurance settlement.	0.20	105.00
12/18/2023	HMJ	Finalize form and execution of life insurance settlement(.4); Follow up with Court and parties on status of same and intentions for hearing(.1).	0.50	262.50
12/21/2023	HMJ	Finalize release scope issues with Trustee and Rabo counsel(.5); Prepare for and attend hearing on approval of life insurance settlement(1.5); Revise approval order and coordinate submission of same(.3).	2.30	1,207.50
12/28/2023	HMJ	Review entered settlement order, follow up with parties re funding.	0.20	105.00
01/23/2024	HMJ	Review status of life insurance funding and follow up with Trustee on same.	0.10	52.50
		For Current Services Rendered	108.70	57,067.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Hudson M. Jobe	108.70	\$525.00	\$57,067.50

Total Current Work 57,067.50

Balance Due \$57,067.50

NOTE: PLEASE REFERENCE THE CLIENT MATTER NO. WITH PAYMENT

Tax ID: 75-2459334

Kent Ries, Chapter 7 Trustee of McClain Debtors

Invoice Date:March 31, 2024

Invoice No.507527

Client No.2322.0006

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Other

ITEMIZED SERVICES BILL

			Hours	
05/11/2023	HMJ	Prepare case background information for Trustee.	2.00	n/c
Balance Due				<u>\$0.00</u>

NOTE: PLEASE REFERENCE THE CLIENT MATTER NO. WITH PAYMENT